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January 12, 2022

Via ECF

Honorable Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: Shaw-Nae Dixon, et al. v. Bill De Blasio, et al.
Civil Action No. 1:21-cv-05090 (BMC)**

Dear Judge Cogan:

As Your Honor is aware, this firm represents the plaintiffs in the above referenced matter. Presently pending before Your Honor is the defendants' motion to dismiss. Plaintiffs' opposition to this motion is currently due Friday, January 14, 2022. With the consent of my adversary, I respectfully request a 30 day extension to oppose the pending motion to dismiss, as our Appeal to the Second Circuit is still pending. Further, I recently started my own law firm and due to the supply chain delays and Covid, we have had delays in becoming fully operational at this time.

We thank Your Honor for consideration of the above.

Respectfully yours,

MURRAY-NOLAN BERUTTI LLC

By: 
Ronald A. Berutti

RAB:jm

cc: Kerri A. Devine, Esq. (via ECF)